

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

**SHAMES DELAHAYE, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 2:22-cv-11341-LVP-KGA

PILGRIM AUTO, LLC, and MARTIN YOUNCE

DEFENDANTS

JOINT NOTICE OF LIABILITY SETTLEMENT

Plaintiff and Defendants submit this Joint Notice of Liability Settlement to apprise the Court that Plaintiff and Defendants have reached a settlement for liability to Plaintiff that will resolve the wage claims asserted by Plaintiff. The parties are in the process of finalizing settlement terms and negotiating for attorneys' fees and costs. Once all terms have been finalized, the parties will file a Joint Motion for Approval of Settlement. The parties will file a status report every 30 days until the Motion for Approval of Settlement is filed, in order to keep the Court informed on the status of finalizing settlement terms. In light of their progress, the parties request that all deadlines be stayed pending finalization of their settlement. If the Parties cannot reach an agreement as to fees and costs, they will notify the Court and Plaintiff will file a Motion.

Respectfully submitted,

**SHAMES DELAHAYE, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFF**

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**and PILGRIM AUTO, LLC, and
MARTIN YOUNCE, DEFENDANTS**

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